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11 *Attorney for Petitioner William Crawford, Jr.

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 William Crawford, Jr.,

15 Petitioner,

16 v.

17 Jerry Howell, et al.,

18 Respondents.

Case No. 2:19-cv-01574-RFB-BNW

**Unopposed motion for extension of
time to file opposition to the
State's motion to dismiss**

(First request)

19 William Crawford respectfully moves this Court for an extension of time of
20 forty-five (45) days, from July 26, 2021, to and including September 9, 2021, in which
21 to file an opposition to the State's motion to dismiss.
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1 due on August 4, 2021, in *Murray v. Howell*, Case No. 21-15104 (9th Cir.); an opposi-
2 tion to a motion to dismiss due on August 12, 2021, in *Ferguson v. Johnson*, Case No.
3 2:19-cv-00946-GMN-BNW (D. Nev.); an opposition to a motion to dismiss due on Au-
4 gust 26, 2021, in *Hobson v. Hutchings*, Case No. 2:20-cv-00503-KJD-NJK (D. Nev.); a
5 second amended petition due on August 30, 2021, in *Palmer v. Gittere*, Case No. 3:18-
6 cv-00245-HDM-CLB (D. Nev.); and an oral argument scheduled for September 3,
7 2021, in San Francisco, California, in *Patterson v. Hutchings*, Case No. 20-15635 (9th
8 Cir.).

9 On July 23, 2021, counsel contacted Deputy Attorney General Sheryl Serreze
10 and informed her of this extension request. As a matter of professional courtesy, Ms.
11 Serreze had no objection to the request. Ms. Serreze's lack of objection shouldn't be
12 considered a waiver of any procedural defenses or statute of limitations challenges or
13 construed as agreeing with the accuracy of the representations in this motion.

14 In sum, counsel requests an additional forty-five (45) days, up to and including
15 September 9, 2021, in which to file the opposition. This is counsel's first request for
16 an extension of time to file the opposition. This motion isn't filed for the purposes of
17 delay, but in the interests of justice, as well as in Mr. Crawford's interest. Counsel
18 respectfully asks the Court to grant the requested extension.


1 Dated July 26, 2021.

2 Respectfully submitted,

3 Rene L. Valladares
4 Federal Public Defender

5 /s/ Jeremy C. Baron
6 Jeremy C. Baron
7 Assistant Federal Public Defender

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10 IT IS SO ORDERED:

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13 **RICHARD E. BOULWARE, II**
14 **United States District Court**
15 DATED this 27th day of July, 2021.